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Attorneys for Secured Creditor
ARCHWAY BROADWAY LOAN SPE, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re
SEATON INVESTMENTS, LLC, *et al.*,

Debtors and Debtors-in-
Possession.

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and
2:24-bk-12076-VZ

Affects:

Chapter 11

- ☐ All Debtors
☐ Seaton Investments, LLC
☐ Colyton Investments, LLC
☒ Broadway Avenue Investments, LLC
☐ SLA Investments, LLC
☐ Negev Investments, LLC
☐ Alan Gomperts
☐ Daniel Halevy
☐ Susan Halevy

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF ARCHWAY BROADWAY
LOAN SPE, LLC'S OPPOSITIONS TO:**

**MOTIONS OF DEBTOR AND DEBTOR
IN POSSESSION BROADWAY AVENUE
INVESTMENTS, LLC FOR ORDERS
AUTHORIZING DEBTOR TO ENTER
INTO POST-PETITION LEASE AND
AUTHORIZING DEBTOR TO OBTAIN
POST-PETITION FINANCING
PURSUANT TO 11 U.S.C. § 364**

Date: November 19, 2024
Time: 11:00 a.m.
Crtrm.: 1368
255 E. Temple Street
Los Angeles, CA 90012

Hon. Vincent P. Zurzolo

FRANZEL ROBINS BLOOM & CSATO, L.C.
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1 Secured creditor, Archway Broadway Loan SPE, LLC, a Delaware limited liability
2 company, successor in interest to Archway Real Estate Income Fund I REIT, LLC (“Archway”),
3 requests that the Court take judicial notice of the following adjudicative facts pursuant to Rule 201
4 of the Federal Rules of Evidence:

5 1. The records of the United States Bankruptcy Court for the Eastern District of
6 Oklahoma, in bankruptcy case numbers 23-80391 and 23-80390, attached to the Declaration of
7 Gerrick M. Warrington as Exhibit 8.

8 2. The records of the United States District Court for the Eastern District of
9 Oklahoma, in case number 6:23-cv-00196-DES, attached to the Warrington Declaration as
10 Exhibits 9–11.

11 3. The records of the California Secretary of State attached to the Warrington
12 Declaration as Exhibits 12, 13, 18.

13 4. The November 6, 2020, Opinion and Order entered by the Review Department of
14 the State Bar Court of California, attached to the Warrington as Exhibit 14

15 5. The Order of Disbarment entered on February 2, 2022, in the Disciplinary Matter
16 of David R. Schwarcz, (C.D. Cal. Case No: 2:21-ad-00461-PSG), attached to the Warrington
17 Declaration as Exhibit 15.

18 6. The printout from the California State Bar for Attorney George Aaron Shohet,
19 attached to the Warrington Declaration as Exhibit 17.

20 7. The records of the Arizona Secretary of State attached to the Warrington
21 Declaration as Exhibits 20, 21.

22 8. The records of the Ohio Department of Commerce, Division of Securities, attached
23 to the Warrington Declaration as Exhibit 22.

24 9. The records of the Financial Industry Regulatory Authority, attached to the
25 Warrington Declaration as Exhibit 23.

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DATED: November 5, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.
MICHAEL GERARD FLETCHER
GERRICK M. WARRINGTON

By: /s/ Gerrick M. Warrington
GERRICK M. WARRINGTON
Attorneys for Secured Creditor
ARCHWAY BROADWAY LOAN SPE, LLC